



**KENTUCKIANA**  
— COURT REPORTERS —

**CASE NO. 20-CV-1123**

**GREGORY BOYER, AS ADMINISTRATOR OF THE ESTATE  
OF CHRISTINE BOYER, AND ON HIS OWN BEHALF**

**VS**

**ADVANCED CORRECTIONAL HEALTHCARE, INC., ET AL.**

**DEPONENT:  
LUCAS RUNICE**

**DATE:  
April 18, 2022**



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1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE WESTERN DISTRICT OF WISCONSIN  
3 JUDGE JAMES D. PETERSON  
4 MAGISTRATE JUDGE STEPHEN L. CROCKER

5 CASE NO: 20-CV-1123  
6

7 GREGORY BOYER, AS ADMINISTRATOR OF THE ESTATE  
8 OF CHRISTINE BOYER, AND ON HIS OWN BEHALF,  
9 Plaintiff,

10  
11 V.  
12

13 ADVANCED CORRECTIONAL HEALTHCARE, INC., ET  
14 AL.,  
15 Defendants  
16  
17  
18  
19  
20  
21  
22

23 DEPONENT: LUCAS RUNICE

24 DATE: APRIL 18, 2022

25 REPORTER: KRYSTAL M. BARNES

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3	ON BEHALF OF THE DEFENDANTS, ADVANCED CORRECTIONAL		3	The VIDEO deposition of LUCAS RUNICE was taken at	
4	HEALTHCARE, AMBER FENNIGKOH, AND LISA PISNEY:		4	KENTUCKIANA COURT REPORTERS 730 WEST MAIN STREET, SUITE	
5	Douglas Knott, Esquire		5	101, LOUISVILLE, KENTUCKY 40202 via videoconference in	
6	Leib, Knott, Gaynor		6	which all participants attended remotely, on MONDAY the	
7	219 North Milwaukee Street		7	18TH day of APRIL 2022 at 9:11a.m.; said deposition was	
8	Suite 710		8	taken pursuant to the FEDERAL Rules of Civil Procedure.	
9	Milwaukee, Wisconsin 53202		9	The above-referenced notarial act involved the use of	
10	Telephone No.: (414) 276-2109		10	communication technology. Specifically, the court	
11	E-mail: dknott@lkglaw.net		11	reporter appeared by videoconference pursuant to KRS	
12	(Appeared via videoconference)		12	423.455 and complied with all statutory requirements.	
13			13		
14			14	It is agreed that KRYSTAL M BARNES, being a Notary	
15			15	Public and Court Reporter, may swear the witness and	
16			16	that the reading and signing of the completed transcript	
17			17	by the witness is not waived.	
18			18		
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<p style="text-align: right;">Page 6</p> <p>1 PROCEEDINGS</p> <p>2 COURT REPORTER: My name is Krystal Barnes. I'm</p> <p>3 the online video technician and court reporter today</p> <p>4 representing Kentuckiana Court Reporters, located at</p> <p>5 730 West Main Street, Suite 101, Louisville,</p> <p>6 Kentucky 40202. Today is the 18th day of April 2022,</p> <p>7 and the time is 10:12 a.m. We are convened by video</p> <p>8 conference to take the deposition of Lucas Runice in</p> <p>9 the matter of Gregory Boyer as administrator of the</p> <p>10 estate of Christine Boyer and on his own behalf</p> <p>11 versus Advanced Correctional Healthcare, Inc., et</p> <p>12 al., pending in the United States District Court for</p> <p>13 the Western District of Wisconsin, Case Number</p> <p>14 20-CV-1123. Will everyone but the witness, please</p> <p>15 state your appearance, how you are attending, and</p> <p>16 the location you are attending from, starting with</p> <p>17 the plaintiff's counsel.</p> <p>18 MR. WEIL: Good morning. My name is Stephen</p> <p>19 Weil, W-E-I-L. I represent the plaintiff. I work</p> <p>20 for the law firm of Loevy &amp; Loevy. I am attending</p> <p>21 this deposition via video from Chicago, Illinois.</p> <p>22 MR. MCCAULEY: And this is -- go ahead, Doug.</p> <p>23 MR. KNOTT: Yeah. This is Doug Knott appearing</p> <p>24 for the ACH Defendants who are Advanced Correctional</p> <p>25 Healthcare, Amber Fennigkoh, Lisa Pisney, appearing</p>	<p style="text-align: right;">Page 8</p> <p>1 been deposed before?</p> <p>2 A Not that I recall. I've --</p> <p>3 Q Have you ever -- go ahead.</p> <p>4 A I've had other -- I don't know if they're</p> <p>5 called affidavits or something like that, but nothing</p> <p>6 like this.</p> <p>7 Q Have you testified in a court before?</p> <p>8 A Yes.</p> <p>9 Q How many times?</p> <p>10 A I believe, twice.</p> <p>11 Q Okay. Did both of those times you testify</p> <p>12 have -- were you offering testimony, having to do with</p> <p>13 your job as a correctional officer?</p> <p>14 A Yes.</p> <p>15 Q Okay. And besides testifying in court, have</p> <p>16 you testified under oath in any form, or in a room with</p> <p>17 a court reporter in it?</p> <p>18 A Yes.</p> <p>19 Q Okay. Can you explain what other testimony</p> <p>20 you've given, besides testimony in court?</p> <p>21 A I guess, I can't.</p> <p>22 Q Okay. You mentioned -- go ahead, I'm sorry.</p> <p>23 A Like I was saying, I've just been in court</p> <p>24 twice.</p> <p>25 Q Okay. Besides those two times -- when you</p>
<p style="text-align: right;">Page 7</p> <p>1 from my office in Milwaukee, Wisconsin.</p> <p>2 MR. MCCAULEY: And it's John McCauley, Hansen</p> <p>3 Reynolds law firm. I'm in the room with the witness</p> <p>4 at the jail in Sparta, Wisconsin, and I represent</p> <p>5 Monroe County and the county defendants.</p> <p>6 COURT REPORTER: All right, Mr. Runice, will</p> <p>7 you please state your full name for the record?</p> <p>8 THE WITNESS: Lucas Runice.</p> <p>9 COURT REPORTER: All right. And do all parties</p> <p>10 agree that the witness is, in fact, Mr. Runice?</p> <p>11 MR. WEIL: Plaintiff agrees.</p> <p>12 MR. KNOTT: Yes.</p> <p>13 COURT REPORTER: All right. Will you raise</p> <p>14 your right hand for me please, sir? Do you solemnly</p> <p>15 swear or affirm that the testimony you are about to</p> <p>16 give will be the truth, the whole truth, and nothing</p> <p>17 but the truth?</p> <p>18 THE WITNESS: Yes.</p> <p>19 COURT REPORTER: Counsel may begin.</p> <p>20 DIRECT EXAMINATION</p> <p>21 BY MR. WEIL:</p> <p>22 Q Good morning, Mr. Runice.</p> <p>23 A Morning.</p> <p>24 Q My name's Steve Weil, as you just heard. I</p> <p>25 represent the plaintiff in this case. Have you ever</p>	<p style="text-align: right;">Page 9</p> <p>1 said, you thought you'd offered other testimony under</p> <p>2 oath with a court reporter present, what did you have in</p> <p>3 mind when you said yes?</p> <p>4 A I had -- I don't know if they're called</p> <p>5 affidavits or something of that sort, where you just</p> <p>6 give -- it's like a couple questions, and then you give</p> <p>7 brief answers to it.</p> <p>8 Q Okay. I'll go over a couple rules. Well, let</p> <p>9 me ask you, when was the last time you testified in</p> <p>10 court?</p> <p>11 A If I had to estimate, it'd be around 2014.</p> <p>12 Q So about eight years ago was the last time?</p> <p>13 A Correct.</p> <p>14 Q Okay. And then in terms of testifying with</p> <p>15 affidavits, were you sitting in a room when you did that</p> <p>16 with people present?</p> <p>17 A I believe, there was only one person in there.</p> <p>18 Q And that person was asking you questions?</p> <p>19 A The questions were typed out, and I had to</p> <p>20 write my own statements for each one.</p> <p>21 Q Okay. How many times did you do that?</p> <p>22 A I believe, twice.</p> <p>23 Q Okay. Did both of those times -- were you</p> <p>24 offering the affidavits as part of your job, as a</p> <p>25 correctional officer?</p>

Page 10

1 A Correct.

2 Q When was the last time you offered affidavits

3 like that -- an affidavit like that?

4 A If I had to estimate, I'd say 2013, 2014.

5 Q I'm going to go over a few rules about

6 depositions to hopefully just make things run smoothly

7 for us today. I expect that you were told a bit about

8 this process before you sat down today. But essentially

9 we're in a room -- in this case, we're remote, but

10 there's a court reporter here. There are two lawyers,

11 besides myself, present. I'm going to be asking

12 questions, and the court reporter is going to take down

13 my questions, your answers. Does that make sense?

14 A Yes.

15 Q You can't see what the court reporter's doing,

16 but she has a little machine that she's typing on, to

17 try to get down what I ask and what you answer. And in

18 normal conversation, it often happens, that people talk

19 over each other. It's not rude, it's just the way

20 everyone talks. We have to suspend that during a

21 deposition as much as we can, because it's very hard for

22 the court reporter to take down two people talking at

23 the same time. Does that make sense?

24 A Yes.

25 Q So I'm going to do the best I can to let you

Page 11

1 finish your answer, before I ask another question. And

2 the flip side is, please let me finish my question

3 before you answer, to make it easy for the court

4 reporter. Does that make sense?

5 A Yes.

6 Q Okay. The lawyers may have objections today.

7 Do you understand that you're being represented by an

8 attorney today at this deposition?

9 A Yes.

10 Q Okay. And who's that?

11 A John.

12 Q Okay. Unless your lawyer instructs you not to

13 answer a question, even if there's an objection made,

14 you're still obligated to answer. Does that make sense?

15 A Yes.

16 Q I don't think this deposition's going to go

17 too long today, but in all events, it's not an endurance

18 contest. If you need a bathroom break, you need to

19 stretch your legs, you're free to do so. The only thing

20 that I would ask is that you -- if there's a question

21 that I've asked pending, that you answer the question

22 before taking the break. Does that make sense?

23 A Yes.

24 Q I -- you may have spoken with your attorney

25 before this deposition about what this is all about or

Page 12

1 what have you. I'm not interested in what you spoke

2 about. During the deposition though, and while you're

3 under oath, there are rules governing whether you can

4 speak with your attorney about this deposition, and the

5 questions I'm asking. And so, if we take a break and

6 you speak with your attorney, I reserve my right to ask

7 you about what you said and what you spoke about. Does

8 that make sense?

9 A Yes.

10 Q Are you under any medication, or any lack of

11 sleep, or anything that would prevent you from providing

12 full and complete answers today?

13 A No.

14 Q Okay. This is my one chance to ask you

15 questions before the trial in this case. So it's not a

16 test of your memory, but I am entitled to your best

17 recollection and your best estimate. Does that make

18 sense?

19 A Yes.

20 Q Did you do anything to prepare for this

21 deposition?

22 A Yes.

23 Q What did you do?

24 A I met with my attorneys.

25 Q I don't want you to tell me what you spoke

Page 13

1 about with your attorneys. But can you say -- when you

2 say you met with your attorneys, can you say who those

3 people were?

4 A John and Andrew (phonetic).

5 Q Okay. When did you meet with them?

6 A I believe, it was on the 12th.

7 Q Okay. Besides meeting with your attorneys on

8 the 12th, did you do anything else?

9 A No.

10 Q Did you review any documents to prepare for

11 your deposition today?

12 A Yes.

13 Q How many documents would you estimate that you

14 reviewed?

15 A Approximately four to five.

16 Q Do you have any memory of what those documents

17 were?

18 A Yes.

19 Q Why don't you list them out, as best you can

20 remember?

21 A One was a med verification sheet, one was the

22 medical watch log, and the other one was a shift log.

23 Q Anything else?

24 A No.

25 Q Do you remember authoring -- do you -- so you

Page 14

1 said four to five. I got three there. Is that --  
 2 A The watch log and the shift log had more than  
 3 one page.  
 4 Q Okay. So you -- when you're referring to  
 5 documents, you're referring to how many pages you  
 6 reviewed?  
 7 A Correct.  
 8 Q Okay. Do you remember -- did you write -- let  
 9 me ask you this, do you remember reviewing any sort of  
 10 report that you made about the incident involving  
 11 Ms. Boyer?  
 12 A I don't recall going over it.  
 13 Q Okay. When did you review the documents that  
 14 you just described to me?  
 15 A I believe they were e-mailed to me on either  
 16 the 12th or the 13th.  
 17 Q How long did you spend talking with your  
 18 lawyers on April 12th to prepare for this -- your  
 19 deposition today?  
 20 MR. MCCAULEY: Object to form.  
 21 A I would say, approximately two hours.  
 22 Q I'm going to show you a document, and in the -  
 23 - we've taken depositions in this room with you in the  
 24 past, so it's been working, but tell me if you have any  
 25 trouble recognizing this document. All right. Do you

Page 15

1 have a document on the screen in front of you now,  
 2 Mr. Runice?  
 3 A Yes.  
 4 Q This is -- what I'm showing for the record is  
 5 Exhibit 18, "Medication Verification Form." Is this one  
 6 of the documents that you reviewed to prepare for your  
 7 deposition?  
 8 (EXHIBIT 18 MARKED FOR IDENTIFICATION)  
 9 A Yes.  
 10 Q All right. I'm showing you another document  
 11 that for the record has been marked as Exhibit 8 in this  
 12 case. Is this -- do you recognize this document,  
 13 Mr. Runice?  
 14 (EXHIBIT 8 MARKED FOR IDENTIFICATION)  
 15 A Yes.  
 16 Q Okay. Is this one of the documents that you  
 17 reviewed to prepare for your deposition today?  
 18 A Yes.  
 19 Q Okay. When you say that you reviewed a shift  
 20 log, can you describe for me what that is?  
 21 A Shift log is in our Zuercher program. And  
 22 it's basically -- we log basically anything that goes on  
 23 throughout the day, whether it's meal passes or head  
 24 counts.  
 25 Q This is a program in which you're typing

Page 16

1 information into a computer, not handwriting it; is that  
 2 right?  
 3 A Correct.  
 4 Q Okay. And did that -- in reviewing that, did  
 5 that contain an entry regarding Ms. Boyer?  
 6 A Correct.  
 7 Q Okay. Was that an entry that you recall  
 8 making?  
 9 A Correct.  
 10 Q Do you have any -- let me ask you just to back  
 11 up real quickly. Where do you work right now?  
 12 A Monroe County Sheriff's department.  
 13 Q All right. Can you give me a bit of  
 14 background about your employment history, starting when  
 15 you graduated from high school?  
 16 A I graduated from Westby High, 2010. 2011, I  
 17 joined the Wisconsin Department of Corrections. I  
 18 worked for them until the beginning of, I believe it was  
 19 January of 2018, where I was then employed by Monroe  
 20 County Sheriff's department.  
 21 Q And you've been at the Monroe County Sheriff's  
 22 department continuously, since January 2018?  
 23 A Correct.  
 24 Q What has your position been during that time  
 25 at the Monroe County Sheriff's department?

Page 17

1 A A correctional officer  
 2 Q That's been the entire time?  
 3 A Correct.  
 4 Q Do you have any recollection of Christine  
 5 Boyer?  
 6 A Yes.  
 7 Q I'm going to ask you questions about your  
 8 independent record. And that means, your recollection  
 9 without having reviewed any of the documents to prepare  
 10 for this deposition. Do you understand what I'm saying?  
 11 In terms -- independent versus reviewing a document and  
 12 seeing what's on a document?  
 13 A Yes.  
 14 MR. MCCAULEY: Object -- object to form.  
 15 Q Okay. Independently of the documents reviewed  
 16 to prepare for this deposition, can you tell me what you  
 17 recall about Christine Boyer?  
 18 A She was brought into the jail one night, and I  
 19 booked her into the jail.  
 20 Q Anything else you recall?  
 21 A I remember she had a lot of unique items on  
 22 her.  
 23 Q What do you mean by, "Items"?  
 24 A She had several pairs of brass knuckles. She  
 25 had several loose medications in her purse. She had a



Page 18

1 large amount of cash on her.

2 Q Anything else you recall?

3 A Not that I can recall.

4 Q Do you recall -- after booking her in, do you

5 recall anything else about that first night with

6 Ms. Boyer?

7 A I recall her being seen by medical.

8 Q What do you mean by -- when you say, "Seen by

9 medical," what do you mean?

10 A After Danielle had done the medical screening

11 on her, Amber, the jail nurse at the time, was notified

12 that she had medical concerns, and Amber had spoke to

13 Christine.

14 Q And after Amber spoke to Christine -- well,

15 let me back up, do -- were you present when Amber spoke

16 to Christine?

17 A I was in the general area.

18 Q Okay. Do you have any recollection of what

19 was said, when they spoke together?

20 A No. I don't.

21 Q After Amber spoke to Christine, do you have

22 any recollection about what happened after that?

23 A Christine was placed on a 30-minute medical

24 watch.

25 Q Any recollection of after that?

Page 19

1 A No.

2 Q The -- do you have any -- besides what you're

3 describing during the booking process, do you have any

4 other recollections about Christine Boyer?

5 A No.

6 Q Do you recall Christine Boyer having a medical

7 emergency at any point, during her stay at the Monroe

8 County Jail?

9 A Yes.

10 Q Okay. And that happened the next day; is that

11 correct?

12 A Correct.

13 Q Let me strike that. During your next shift;

14 is that right?

15 A Correct.

16 Q What can you tell me about what you remember

17 about what happened on the next shift with Christine

18 Boyer?

19 A I recall I was working in master control, and

20 I looked at the cameras on the monitor, and seen

21 Christine laying on the floor of the cell.

22 Q Anything else that you recall?

23 A I notified Danielle, who was working in

24 booking, to go check on her. And when Danielle entered

25 the cell, she called for -- she wanted EMS. And I

Page 20

1 called dispatch, and informed them that we needed EMS

2 and possibly some extra officers to the jail.

3 Q Anything else you remember?

4 A Yeah. I remember that we were short staffed

5 that night. So in master control, I'd control all the

6 doors in the entire jail. And I let Kyle and Jeff, the

7 two officers that were working in housing, out of

8 housing. And they came up to the jail, and started to

9 assist with the medical emergency and Christine.

10 Q What happened after that; if you remember?

11 A They were working on -- they were assisting

12 Christine, and I was trying to open doors to let the

13 other officers through the sheriff's side of the jail.

14 And EMS was arriving, so I was also opening those doors.

15 I was also attempting to contact the appropriate people

16 on the telephone, to inform them of what was going on.

17 Q Do you recall anything else about that shift

18 with Christine Boyer?

19 A No.

20 Q Do you recall contacting a service for -- to

21 dispatch a helicopter for Christine Boyer?

22 A No.

23 Q Okay. Do you recall that Christine Boyer was

24 transported from the jail in a helicopter?

25 MR. MCCAULEY: Object to form. Hey, Steve, you

Page 21

1 just broke up there. So we got about half your

2 question.

3 BY MR. WEIL:

4 Q Do you recall Christine Boyer being

5 transported away from the jail in a helicopter?

6 A I was informed of that after -- after the

7 incident.

8 Q Okay. Do you recall speaking with anybody at

9 the jail about the events surrounding Christine Boyer?

10 A Are you saying during the incident?

11 Q We'll get to that, but afterwards.

12 A Yeah. I mean, I'm sure it was brought up at

13 some point.

14 Q Okay. I'm going show you an exhibit that's

15 been more marked as Exhibit 2. Can you see a document

16 that looks kind of like a floor layout in front of you,

17 Mr. Runice?

18 (EXHIBIT 2 MARKED FOR IDENTIFICATION)

19 A Correct.

20 Q All right. Do you recognize this floor layout

21 at all?

22 A Yes.

23 Q Okay. What is this a layout of?

24 MR. MCCAULEY: I'm just going to interrupt and

25 say, if you want to approach the screen -- if you

Page 22

1 need to, feel free to do that.

2 A Okay. It's a map of the booking area.

3 BY MR. WEIL:

4 Q I want to -- we've gone over your independent

5 recollection about Christine Boyer. And I want to just

6 backtrack a little, and talk about the two shifts that

7 you were on. You were on the night shift in December of

8 2019; is that right?

9 A Correct.

10 Q Okay. And from reviewing the documents in

11 preparation for this deposition, you're aware that

12 Christine Boyer was brought in on the evening of

13 December 21, 2019; is that right?

14 A Correct.

15 Q Okay. On that evening, were you working in

16 booking; if you remember?

17 A Correct.

18 Q Okay. Where is booking? If you're working in

19 booking, is that -- are you sitting somewhere in this

20 floor plan?

21 A Correct.

22 Q Okay. Where are you stationed in the floor

23 plan?

24 A It doesn't have a -- where it says -- I think

25 it says, "Bonds area," and then there's like a wall that

Page 23

1 separates -- if you go to your right.

2 Q Where my cursor is here, it says, "Bonds"?

3 A Yeah. Yeah. If you go to the right to that

4 wall, right above, "A," where it says -- yeah. Correct.

5 Q Okay. Right above the AED, you're saying

6 that's the booking area?

7 A Correct.

8 Q Let me show you Exhibit 1 real quickly. So

9 you're looking out Exhibit 1. Do you recognize this

10 diagram at all?

11 (EXHIBIT 1 MARKED FOR IDENTIFICATION)

12 A Yes.

13 Q Okay. Do you see the booking area in Exhibit

14 1?

15 A I believe, it's the one that's labeled, "C."

16 Q Okay. And is that where you remember being

17 stationed on the night of December 21, 2019?

18 A Correct.

19 Q Okay. I'm going to show you now a document

20 that's been marked as Exhibit 16 in this case. This was

21 a list provided to us of the -- purported list of the

22 persons working at the jail, during Christine Boyer's

23 stay at the jail from December 21st to December 23rd,

24 2019. Do you -- can you read the names on that list,

25 Mr. Runice?

Page 24

1 (EXHIBIT 16 MARKED FOR IDENTIFICATION)

2 A Yes.

3 Q Okay. As best you can remember, do you

4 remember who was working with you at the jail, on the

5 night shift, on December 21st?

6 A It would be Sergeant Danielle Warren,

7 Corrections Officer Kyle Moga, and Corrections Officer

8 Jeff Schwanz.

9 Q Anyone else that you recognize from this list,

10 as working with you on that shift?

11 A I believe the on-call James Tucker was there,

12 also at the beginning of shift.

13 Q What does, "On-call," mean; if you know?

14 A He's a part-time employee.

15 Q Okay. Does that mean he would not have been

16 there the whole shift, but would've been there for part

17 of it?

18 A Correct.

19 Q Now the night shift is 6:00 p.m. to 6:00 a.m.;

20 is that right?

21 A Correct.

22 Q Okay. And is it the case, that some people

23 working on any shift are stationed in the booking area,

24 and then others are in the -- stationed in the other

25 parts of the jail; is that right?

Page 25

1 A Correct.

2 Q Do you remember who was stationed in booking,

3 on the night of December 21st?

4 A I believe, Danielle was.

5 Q And you were, correct?

6 A Correct.

7 Q Okay. How many employees would typically be

8 on a shift during this time, at the jail, total?

9 A Typically, it's five. Unless we have a

10 part-time officer working and then there can be up to

11 six.

12 Q Okay. Is it typically two people in booking

13 and then -- in the booking area, and then the others are

14 in the other parts of the jail?

15 A Correct. If it's busy in booking, they'll

16 have two, or the second booking officer will float

17 around where help is needed.

18 Q Okay. So there's always one person in master

19 control; is that right?

20 A Correct.

21 Q Okay. And then there would be a person, say,

22 in your role on December 21st, who's at the booking desk

23 and taking people in on booking?

24 A Correct.

25 Q Do you remember who was in master control on



Page 26

1 the night of December 21st?

2 A I don't recall.

3 Q Okay. If you were in booking and we -- so

4 we've taken the deposition of Danielle Warren in this

5 case, and we understand from that deposition that she

6 did the intake with Ms. Boyer, as Ms. Boyer came into

7 the jail. Would that indicate to you that she wasn't in

8 booking, given your understanding of how the booking

9 area operates -- or I'm sorry that she was not in master

10 control?

11 A Sorry. I'm kind of --

12 Q You're not following me? That's fair. That's

13 fair.

14 A No --

15 Q Go ahead.

16 A No. I was just going to ask if you could ask

17 the question over again.

18 Q Sure, sure. I'm trying to -- I'm trying to

19 get your recollection of who would've been in booking on

20 the night of -- on that night shift of December 21st. So

21 again, we've taken the deposition of Danielle Warren,

22 this case. And our understanding from that deposition

23 is that she conducted the intake of Ms. Boyer, as Ms.

24 Boyer came into the jail. My understanding is a person

25 conducting intake would not be in the main control area,

Page 27

1 is that -- is that how things operate?

2 A Correct. She would not have been a master

3 control.

4 Q And if you were in booking and did the booking

5 Ms. Boyer, would that mean that you were not in master

6 control either?

7 A Correct.

8 Q Okay. And so would that indicate to you a

9 third person in the booking area that night?

10 MR. MCCAULEY: Object to form.

11 A There would've been one in master control.

12 Q Okay. And to your recollection, that would

13 not have been Kyle Moga or Jeff Schwanz, right?

14 A I don't recall who was in master control.

15 Q Okay. In light of that conversation we just

16 had, is there anybody else on this list, who you believe

17 might have been in the booking area, specifically master

18 control, on the evening of December 21st?

19 A If somebody would've been staying on overtime

20 from first shift? Again, I -- I don't recall who

21 would've stayed or who did stay, but...

22 Q So Mr. Runice, directing you again to Exhibit

23 1, you said that you were in -- you would've been in

24 booking, which is area C, right? On the evening of

25 December 21st?

Page 28

1 A Correct.

2 Q And I believe you said, that you recalled

3 Ms. Fennigkoh and Ms. Boyer having a conversation on the

4 evening of December 21st?

5 A Correct.

6 Q Can you identify about where you believe that

7 conversation occurred on, on this layout map?

8 A It was near C.

9 Q Okay. So near the booking area C?

10 A Correct.

11 Q Any more -- anything more specific that you

12 can recall about where it would've occurred?

13 A No.

14 Q Okay. I'm showing you now, what's been marked

15 as Exhibit 4 in this case, and I'm going to scroll

16 through it really quickly, Mr. Runice. And you just

17 tell me if you can recognize it at all. Is this a

18 document --

19 (EXHIBIT 4 MARKED FOR IDENTIFICATION)

20 A Yes.

21 Q Okay. You can recognize it?

22 A Correct.

23 Q Is this a document that you reviewed in

24 preparation for your deposition today?

25 A No.

Page 29

1 Q Okay. Do you -- can you tell me what this

2 document is?

3 A It's called the face (phonetic) sheet.

4 Q Okay. And how is this document prepared; if

5 you know?

6 MR. MCCAULEY: Object to form.

7 A When you book somebody in, it gives different

8 levels in the program. So like the first level will ask

9 personal information, such as date of birth, age,

10 height, weight, and basically you'll enter all that info

11 in. And once you go to print, it'll come out as that

12 sheet.

13 Q Okay. Is this a document with the entry --

14 the data entry you're describing just now, is that

15 something that's done by the booking officer?

16 A Correct.

17 Q Okay. Do you see your name here? It says,

18 "Booked by"?

19 A Correct.

20 Q Okay. Does that indicate to you, that you

21 enter the information that's described in this sheet?

22 A Yes.

23 Q Okay. And that information that you're

24 describing is the demographic information that's next to

25 Ms. Boyer's photo; is that right?

<p style="text-align: right;">Page 30</p> <p>1 A Correct.</p> <p>2 Q Okay. I believe that you said -- so you enter</p> <p>3 information, like sex, date of birth, age height, that</p> <p>4 sort of information?</p> <p>5 A Correct.</p> <p>6 Q Is some of this information automatically</p> <p>7 generated? As in, when you printed out it's not</p> <p>8 something you entered, but it's generated by the</p> <p>9 program?</p> <p>10 A No.</p> <p>11 Q Okay.</p> <p>12 A The JCA number would be the only thing that's</p> <p>13 automatically generated.</p> <p>14 Q The JCA number is this number, "201900787"; is</p> <p>15 that right?</p> <p>16 A Correct.</p> <p>17 Q Okay. The other information on the sheet</p> <p>18 would be entered by the booking officer; is that right?</p> <p>19 A Correct.</p> <p>20 Q There's -- on the second page, do you see</p> <p>21 where it says, "Charge"?</p> <p>22 A Yes.</p> <p>23 Q Okay. And below that, it says -- a couple</p> <p>24 lines down, it says, "Scheduled intake court appearance,</p> <p>25 date," do you see that?</p>	<p style="text-align: right;">Page 32</p> <p>1 sits in front of a judge, and typically they're -- they</p> <p>2 have the public defender there for them, and the DA is</p> <p>3 also there. And a bond is set for them, so they can be</p> <p>4 released from the jail. And it typically has bond</p> <p>5 conditions on it.</p> <p>6 Q And your understanding is that's what's done</p> <p>7 on this bond court date, that you entered here?</p> <p>8 A Correct.</p> <p>9 Q There's a signature down here at the bottom,</p> <p>10 do you see that?</p> <p>11 A Yes.</p> <p>12 Q It -- how is that a signature -- it looks like</p> <p>13 Ms. Boyer's signature; is that right?</p> <p>14 A Correct.</p> <p>15 Q Okay. How is -- how does the detainee go</p> <p>16 about signing this form?</p> <p>17 A It's signed on a -- on a electronical pad.</p> <p>18 Q Once the detainee signs the form, is it</p> <p>19 printed out, and provided to them?</p> <p>20 A They do not get a copy of that document.</p> <p>21 Q Is the detainee given information about their</p> <p>22 bond court date, during the booking process?</p> <p>23 A We typically inform them of when they will be</p> <p>24 going.</p> <p>25 Q I am showing you now what's been marked as</p>
<p style="text-align: right;">Page 31</p> <p>1 A Yes.</p> <p>2 Q Is that information that you would've have</p> <p>3 entered as a booking officer? The court appearance date</p> <p>4 and the time?</p> <p>5 MR. MCCAULEY: Object to form.</p> <p>6 A Yes.</p> <p>7 Q Okay. And do you know how you knew to enter</p> <p>8 this date and time? It says Monday -- or it doesn't say</p> <p>9 Monday. It says, "December 23, 2019, 13:00," hours is</p> <p>10 the scheduled intake court appearance date, do You see</p> <p>11 that?</p> <p>12 A Yes.</p> <p>13 Q How would you -- how did you enter -- how did</p> <p>14 you know to enter that information in the intake sheet -</p> <p>15 - the face sheet?</p> <p>16 MR. MCCAULEY: Object to form.</p> <p>17 A It would've been the following business day.</p> <p>18 Q And how did you know there was a court date on</p> <p>19 the following business day?</p> <p>20 A Cause we typically have bond court on the --</p> <p>21 on Mondays.</p> <p>22 Q Okay. So this would be a bond court date?</p> <p>23 A Correct.</p> <p>24 Q Can you tell me what, "Bond court," is?</p> <p>25 A Bond court is when the individual goes and</p>	<p style="text-align: right;">Page 33</p> <p>1 Exhibit 3 in this case. I'm going to scroll through it</p> <p>2 real quickly with you, Mr. Runice. My first question</p> <p>3 is, did you get a chance to look at it?</p> <p>4 (EXHIBIT 3 MARKED FOR IDENTIFICATION)</p> <p>5 A Yes.</p> <p>6 Q Okay. Without referring to the specific</p> <p>7 information that's handwritten in here, do you recognize</p> <p>8 this form?</p> <p>9 A Yes.</p> <p>10 Q What is it?</p> <p>11 MR. MCCAULEY: Just object to form. Just going</p> <p>12 to share, the -- only a portion of the document is</p> <p>13 up, at this point.</p> <p>14 BY MR. WEIL:</p> <p>15 Q Cool (phonetic). So I've scrolled through</p> <p>16 this document, Mr. Runice. So I'm asking you, it's a</p> <p>17 three-page document, right?</p> <p>18 A Correct.</p> <p>19 Q And it's handwritten information on a form,</p> <p>20 right?</p> <p>21 A Correct.</p> <p>22 Q Okay. Without referring to the handwritten</p> <p>23 information that's written in here, can you just</p> <p>24 describe what this form is?</p> <p>25 A It's an, "Intake Medical Screening Report."</p>

Page 34

1 Q Okay. And is this a report that's prepared,  
2 as a person is being taken into the jail during the  
3 booking process?  
4 A Correct.  
5 Q And my understanding from deposing other  
6 witnesses in this case is that this form is typically  
7 filled out before a person is moved over to booking, in  
8 the sequence of them be brought into the jail; is that  
9 right?  
10 A Correct.  
11 Q When the form is filled out and it -- the  
12 person's brought over to booking, do you know what  
13 happens to the form itself? And again, I'm referring  
14 generally here, your understanding of the process. Do  
15 you understand what happens with the form, as it --  
16 after it's been filled out on the intake process, and  
17 the person's brought over to booking?  
18 A Yes.  
19 Q What happens to the form?  
20 A It'll get a face sheet stapled to it, and it  
21 goes to medical.  
22 Q Okay. My understanding from other depositions  
23 taken in this case, is that there's something of an  
24 intake box or a wire basket at the booking station, and  
25 the -- this form is placed in that wire basket; is that

Page 35

1 right?  
2 MR. MCCAULEY: Object to form.  
3 A Correct.  
4 Q Okay. And did you say this -- this was --  
5 this would be stapled to the face sheet, that we just  
6 reviewed?  
7 A Correct.  
8 Q And so the persons brought over to booking  
9 with this intake medical screening report, the booking  
10 process is completed. The face sheet is printed out.  
11 Those two documents are stapled together, and they're  
12 placed in the wire basket at the booking station; is  
13 that right?  
14 A Correct.  
15 Q Okay. Turning you to this -- the actual  
16 handwriting in Exhibit 3, have you seen Exhibit 3  
17 before, in preparation for your deposition today?  
18 A No.  
19 Q Do you recognize this document at all?  
20 A Yes.  
21 Q Okay. Tell me what do you recognize it as?  
22 MR. MCCAULEY: Object to form.  
23 A An, "Intake Medical Screening Report."  
24 Q Okay. So, Mr. Runice, just referring to your  
25 memory again, of that evening, you said that you

Page 36

1 recalled Ms. Boyer having a conversation with  
2 Ms. Fennigkoh, right?  
3 A Correct.  
4 Q And I think you said, you weren't able to hear  
5 what was said during that conversation; is that right?  
6 A Correct.  
7 Q I am going to show you now, what's been marked  
8 as Exhibit 6. This is a, "Narrative Progress Note,"  
9 created by Amber Fennigkoh. And why don't you just take  
10 a minute to read this entry that's dated  
11 December 21, 2019, 22:40. Can you read it okay? I'm  
12 going to blow it up a little here, Mr. Runice for you.  
13 Let's see if we can make it a little bigger. Can you  
14 read it okay there?  
15 (EXHIBIT 6 MARKED FOR IDENTIFICATION)  
16 A Yes.  
17 Q Okay. Great. Just take a minute to read it.  
18 And then I have a couple questions. Just let me know  
19 when you're done, Mr. Runice, and I can ask the  
20 questions.  
21 A I'm completed.  
22 Q Okay. So Ms. Fennigkoh testified, this was a  
23 summary that she wrote up after the intake process. and  
24 I'm interested in the last line here, "RN instructed  
25 jail staff to alert NP of situation when able." Do you

Page 37

1 recall having a conversation with Ms. Fennigkoh about  
2 Ms. Boyer, after -- as the intake process was being  
3 completed?  
4 A No.  
5 Q Okay.  
6 MR. KNOTT: I'm sorry. Could I have that  
7 question again? I had something interrupt me here.  
8 MR. WEIL: Go ahead. I -- does the court  
9 reporter want to ask the -- to read it back or...?  
10 COURT REPORTER: Yeah.  
11 MR. WEIL: Well, I can just -- I can just do it  
12 real quickly.  
13 BY MR. WEIL:  
14 Q But -- so do you recall having a conversation  
15 with Ms. Fennigkoh, Mr. Runice, after the intake process  
16 was being completed?  
17 A No.  
18 MR. KNOTT: Okay. Thank you.  
19 Q Do you remember talking with anybody about  
20 alerting Lisa, the nurse practitioner, about Ms. Boyer?  
21 MR. MCCAULEY: Object to form.  
22 A No.  
23 Q Do you remember being told -- you testified a  
24 bit ago that Ms. Boyer was placed on a medic --  
25 30-minute medical watch, right?

Page 38

1 A Correct.

2 Q Do you remember being told why Ms. Boyer was

3 being placed on a medical watch?

4 A No.

5 Q Okay. I am now showing you what's been marked

6 as Exhibit 8, Mr. Runice, and we saw this at the

7 beginning of your deposition. This is one of the

8 documents you reviewed in preparation of your deposition

9 today, correct?

10 A Correct.

11 Q Okay. Now, your -- this is a, "Monroe County

12 Jail Observation Log," right?

13 A Correct.

14 Q And the purpose of this log is to record

15 observations about folks who are being observed for

16 medical purposes; is that right?

17 A Correct.

18 Q You are -- the way this works in terms of

19 recording information, is that a badge number is

20 recorded, so it can be determined later who made the

21 medical observation; is that right?

22 A Correct.

23 Q And your badge ends in 58; is that true?

24 A Correct.

25 Q And so this has you doing observations -- I'm

Page 39

1 looking at the second page of Exhibit 8, this records

2 you making observations that -- looks like 11:32 and

3 then 11:46 p.m. on December 21st; is that right?

4 A Correct.

5 Q Do you remember being told, or asking what you

6 should be looking for, or what you should be observing

7 Ms. Boyer for?

8 A No.

9 Q Okay. This -- again, Mr. Runice, is Exhibit

10 18. And this is one of the documents you've reviewed,

11 in preparation for your deposition today; is that right?

12 A Correct.

13 Q Okay. And your badge number is down here in

14 the right hand corner, "1258"; is that right?

15 A Correct.

16 Q Do you recognize your handwriting anywhere in

17 this document?

18 A On the top two columns, I would call them.

19 Q Okay.

20 A And -- and that information above appears to

21 be mine.

22 Q Okay. So, this information on the "Date,

23 time, detainee name, ID number, age, and date of birth"?

24 A Correct.

25 Q Is that -- okay. You recognize it as your

Page 40

1 handwriting?

2 A Correct.

3 Q Okay. And then, I believe you said, the -- in

4 turning to the form itself, I believe you said, you

5 recognized that the first two -- the number one and

6 number two medical entries as -- or entries, as your

7 handwriting as well?

8 MR. MCCAULEY: Objection to form.

9 A Correct.

10 Q Okay. Is the third entry -- does you

11 recognize -- is that your handwriting? I can blow it up

12 a little here.

13 A It doesn't appear to be my handwriting.

14 Q Okay. And the fourth and fifth entries, do

15 those appear to be your handwriting?

16 A I don't believe so.

17 Q Okay. So we've gone over the first column,

18 the second column, the medication -- so this is the --

19 sorry. For one and two, there's sort of -- there's a

20 column here that has sort of a bunch of sub columns, "RX

21 filled, number of pills in bottle, medication name, and

22 medication dose," right?

23 A Right.

24 Q And so when you're saying that you recognize

25 your handwriting is filling these out, you're referring

Page 41

1 to that first column, with all those sub columns that

2 are just listed for the first two?

3 MR. MCCAULEY: Object to form.

4 A Correct.

5 Q Okay. Turning you to the second large column,

6 "Medication instructions," do you see that?

7 A Yes.

8 Q Okay. The first line for, "Oxycodone," is

9 that your -- in the medication instructions column, is

10 that your handwriting there?

11 A Yes.

12 Q And then this next line for number two,

13 "Ondansetron." Is that -- it says, "As needed for

14 nausea from chemo radiation," do you see that?

15 A Yes.

16 Q Is that your handwriting there?

17 A No.

18 Q Do you know whose handwriting that is?

19 A No.

20 Q Do you recall filling out any part of this

21 form?

22 A I'm sorry. You cut out.

23 Q I'm sorry. Do you recall filling out any part

24 of this form, Exhibit 18?

25 A Just the portions that we just discussed.

<p style="text-align: right;">Page 42</p> <p>1 Q Do you remember why you were filling out this</p> <p>2 form?</p> <p>3 A I don't. I just remember that the oxycodone</p> <p>4 is a narc, and I wanted to make sure that all the pills</p> <p>5 were accounted for.</p> <p>6 Q Is it -- is it part of the job of the booking</p> <p>7 officer to fill out forms like this, as part of the</p> <p>8 booking process, when somebody comes in with medication?</p> <p>9 A Yes.</p> <p>10 Q Okay. And in term -- there's a -- sort of, a</p> <p>11 third column here in Exhibit 18 that says, "Approved,"</p> <p>12 do you see that?</p> <p>13 A Yes.</p> <p>14 Q Do you understand -- I'm not referring to this</p> <p>15 document specifically, but do you understand how the --</p> <p>16 this column, the, "Approved," column gets filled out</p> <p>17 ultimately?</p> <p>18 A Yes.</p> <p>19 Q How's -- how's that filled out?</p> <p>20 A You have to call the provider, and inform them</p> <p>21 of all the information beforehand, and they will either</p> <p>22 approve it or deny it.</p> <p>23 Q On the night shift, when somebody comes in</p> <p>24 shortly before, like, midnight, like Christine Boyer</p> <p>25 did, would it -- was there a practice, in terms of</p>	<p style="text-align: right;">Page 44</p> <p>1 A Correct.</p> <p>2 Q Do you have any recollection of calling Ms.</p> <p>3 Pisney the night Ms. Boyer was taken in on an intake,</p> <p>4 about the medications that she'd received?</p> <p>5 A No.</p> <p>6 Q In terms of the entry in the, medication</p> <p>7 instructions, how would you go about making an entry?</p> <p>8 I'm looking at the first row, "One tab, 4X daily for</p> <p>9 pain," do you see that?</p> <p>10 A Yes.</p> <p>11 Q Okay. The fact that there's a medication</p> <p>12 instruction entry here, would that indicate to you that</p> <p>13 you called Ms. Pisney?</p> <p>14 A No.</p> <p>15 MR. KNOTT: Object to the form.</p> <p>16 Q No? Did he say, "No"?</p> <p>17 A No.</p> <p>18 Q Okay. Where would this medication instruction</p> <p>19 entry come from if -- if you hadn't called Ms. Pisney?</p> <p>20 MR. MCCAULEY: Object to form.</p> <p>21 A From the bottle or the prescription bottle.</p> <p>22 Q Okay. So you would record what the</p> <p>23 prescription bottle said, in terms of the medication</p> <p>24 instructions on the bottle?</p> <p>25 A Correct.</p>
<p style="text-align: right;">Page 43</p> <p>1 calling the provider to get an approval for the</p> <p>2 administration of medication?</p> <p>3 MR. MCCAULEY: Object to form.</p> <p>4 A I would say, it'd depend on what the</p> <p>5 medication was.</p> <p>6 Q Do you have any indication of whether you</p> <p>7 would've called the -- well, let -- let's just go to</p> <p>8 this first one. I'm sorry, just to back up. In this --</p> <p>9 in the second column for entry two, "As needed for</p> <p>10 nausea from chemo radiation," do you see that?</p> <p>11 A Yes.</p> <p>12 Q You said that was not your handwriting, right?</p> <p>13 A Correct.</p> <p>14 Q And I may have missed it. There's -- there's</p> <p>15 another officer here. "1257," do you see that?</p> <p>16 A Yes.</p> <p>17 Q Do you recognize that as Brooke Dempsey's</p> <p>18 badge number?</p> <p>19 A Correct.</p> <p>20 Q Do you recognize any handwriting on this form,</p> <p>21 as Brooke Dempsey's handwriting?</p> <p>22 A I can't recall her handwriting looks like.</p> <p>23 Q Okay. Brooke Dempsey was on the day shift; is</p> <p>24 that right?</p> <p>25 MR. MCCAULEY: Object to form.</p>	<p style="text-align: right;">Page 45</p> <p>1 Q Okay.</p> <p>2 MR. WEIL: Sorry, Mr. Runice. There we go. You</p> <p>3 know, how about we take a quick restroom break, just</p> <p>4 five minutes. We can come back at 10:20.</p> <p>5 COURT REPORTER: We are off the record. It is</p> <p>6 --</p> <p>7 MR. KNOTT: Can I get 10 minutes, Steve?</p> <p>8 MR. WEIL: Sure. No problem. Let's -- we'll</p> <p>9 come back at --</p> <p>10 MR. KNOTT: I need to make a phone call.</p> <p>11 MR. WEIL: 10:25.</p> <p>12 COURT REPORTER: 10:25. We are off the record.</p> <p>13 It is 10:14 a.m.</p> <p>14 (OFF THE RECORD)</p> <p>15 COURT REPORTER: We are back on the record. The</p> <p>16 time is 10:28 a.m.</p> <p>17 BY MR. WEIL:</p> <p>18 Q Runice -- Mr. Runice, just directing you again</p> <p>19 to the medication verification.</p> <p>20 AUTOMATED VOICE RECORDING: Unknown caller.</p> <p>21 MR. WEIL: I'm sorry. Just one minute.</p> <p>22 MR. MCCAULEY: Make sure that that's shut, real</p> <p>23 quick.</p> <p>24 THE WITNESS: Yeah.</p> <p>25 MR. MCCAULEY: Thanks, Lucas. I should have</p>



Page 46

1 done that.

2 THE WITNESS: No. You're all right.

3 MR. WEIL: Apologies.

4 MR. MCCAULEY: That's okay.

5 BY MR. WEIL:

6 Q Okay. Directing you to the medication

7 verification form that we've been talking about. When

8 you completed that, what would you do with a form like

9 that, once you completed it?

10 A If all the medication was verified, then you

11 would call it into the -- to the doctor, and inform them

12 of the medications, and everything else. And then they

13 would approve it or not approve it.

14 Q Okay. I guess, I meant with the piece -- say

15 in the booking process, what would you do with the form

16 itself, the piece of paper?

17 A The -- the medication form?

18 Q Here. I'll pull it back up, so --

19 A Okay.

20 Q So, this. Can you see Exhibit 18, Mr. Runice?

21 A Yes.

22 Q Okay. Just -- this piece of paper, once you

23 filled it out, where would that go? What would happen

24 with the piece of paper?

25 A It would go to medical.

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1 Q Okay. In the case where -- it was -- when you

2 say it goes to medical, would it be included with a face

3 sheet and the intake sheet, and placed in that wire

4 basket?

5 MR. MCCAULEY: Form.

6 A No.

7 Q What would happen with it?

8 MR. MCCAULEY: Form.

9 A I personally put it in a Ziploc baggie with

10 the face sheet and also the medications. And it's

11 placed in a secure area inside medical.

12 Q Okay. When we spoke a few minutes ago -- I

13 believe you just said, you'd place it in a Ziploc

14 baggie, with a face sheet and a medication sheet; is

15 that right?

16 MR. MCCAULEY: Object to form.

17 A Correct.

18 Q We spoke a few minutes ago about what you

19 would do with a face sheet and the intake sheet. And my

20 understanding it, from what you told me was, that those

21 two sheets would be placed on a -- in a basket at the

22 booking station; is that right?

23 MR. MCCAULEY: Object to the form of the

24 question. Go ahead.

25 THE WITNESS: Sorry (phonetic).

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1 MR. KNOTT: Join.

2 A The -- the intake one is placed in a basket,

3 behind booking.

4 BY MR. WEIL:

5 Q Okay. And that's the intake Exhibit 3 here --

6 the intake medical screening report, right?

7 A Correct.

8 Q Okay. And as I understood your testimony

9 earlier, the intake medical screening report would be

10 attached to, or stapled to, or paper clipped with the

11 face sheet -- the booking face sheet, that you filled

12 out on the computer; is that right?

13 A Correct.

14 Q Okay. You -- and I understand you're

15 describing a different process for the medication

16 verification form; is that right?

17 A Correct.

18 Q Okay. And so can you describe again the

19 process for what you would do with a medication

20 verification form, once you filled it out?

21 A I take -- I take the -- the verification form,

22 along with a face sheet, and put it in a Ziploc baggie,

23 along with the medications that go along with the --

24 with the verification form. And it's placed in the

25 office of medical, in a secured area.

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1 Q And why is that done?

2 A So that they can be either called in or

3 medical can order the -- order more of the medications,

4 whatever medical needs to do to follow up with it.

5 Q In Ms. Boyer's case here, we've been talking

6 about three documents that were created when she came

7 in. One is the face sheet, correct?

8 A Correct.

9 Q Okay. One is the intake medical screening

10 report, right?

11 A Correct.

12 Q And the third is the medication verification

13 form, right?

14 A Correct.

15 Q Okay. My understanding from the testimony

16 earlier -- I'm not trying to put words in your mouth,

17 I'm just trying to understand what's happening. My

18 understanding from your testimony earlier, that the face

19 sheet and the intake medical screening report would be

20 appended to each other, and placed in a basket in

21 booking --

22 MR. MCCAULEY: Form.

23 Q -- is that correct?

24 A Correct.

25 Q Okay. And so that's the first two documents.



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1 It -- you're saying that something different happens to  
 2 this third document, the medication verification form?  
 3 A Correct.  
 4 Q Okay. And so the medication verification form  
 5 is not placed in the basket in booking; is that right?  
 6 A Typically not, if there's medications along  
 7 with it? No.  
 8 Q Okay.  
 9 A They shouldn't be left out.  
 10 Q Okay. And so that medication verification  
 11 form, is it separated from the first two forms, where  
 12 the first two forms go into the basket, and this third  
 13 medication verification form goes into a secure area in  
 14 medical?  
 15 MR. MCCAULEY: Object to the form. It's asked  
 16 and answered. Go ahead. Sorry.  
 17 A Correct. They are separate.  
 18 Q Okay. In Ms. Boyer's case, do you recall that  
 19 procedure where the face sheet and the -- again, Exhibit  
 20 3, the intake medical screening report, those were  
 21 placed in the basket. And then the medication  
 22 verification form was separated and placed somewhere in  
 23 medical?  
 24 MR. MCCAULEY: Object to form.  
 25 MR. KNOTT: Join.

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1 A I don't recall that process being done.  
 2 Q Would that have been your standard process,  
 3 for a detainee who comes in with medications?  
 4 MR. MCCAULEY: Same objection.  
 5 A She had loose medications in her purse that  
 6 the pills could not be ID'ed. So therefore, we wouldn't  
 7 have called them in or did anything with them because we  
 8 didn't have the prescription, they were loose pills. But  
 9 I believe the pills were taken to medical, and placed in  
 10 a secured area.  
 11 Q Okay. Sir, is that based on your  
 12 recollection, or are you describing a standard process?  
 13 A Sorry. Can you ask the question again?  
 14 Q Sure. I'm asking what -- so I'm asking -- I'm  
 15 trying to understand what you recall about Ms. Boyer's  
 16 intake. And it sounds like you say you recall that she  
 17 had loose pills; is that right?  
 18 A Correct.  
 19 Q What is that recollection based on?  
 20 A I found pills -- smaller pills in the bottom  
 21 of her purse and they were all --  
 22 Q I guess --  
 23 A I can't --  
 24 Q Go ahead.  
 25 A I don't recall exactly how many different ones

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1 there were, but I remember that there was a couple  
 2 different pills, not -- not in any sort of packaging or  
 3 container  
 4 Q As part of the booking process then, do you --  
 5 you -- it sounds like you're testifying, that you recall  
 6 examining Ms. Boyer's purse?  
 7 A Correct.  
 8 Q And you recall locating pills in the purse?  
 9 A Correct.  
 10 Q And you recall that some of those pills were  
 11 loose, and some were in a prescription bottle; is that  
 12 right?  
 13 A I believe, only the oxycodone was in a  
 14 prescription bottle.  
 15 Q And -- okay. And so, again, turning to -- do  
 16 you -- based on that recollection, do you remember what  
 17 you did with the medication verification form, after  
 18 filling it out?  
 19 A I don't recall.  
 20 Q Okay. And so when you were describing placing  
 21 the medication verification form in a Ziploc baggie, are  
 22 you describing your standard process or something you  
 23 recall doing for Ms. Boyer?  
 24 A That's something that I typically do.  
 25 Q Okay. Do you have any recollection of doing

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1 that with Ms. Boyer?  
 2 MR. MCCAULEY: Object to form. Asked and  
 3 answered.  
 4 A I don't recall because we were trying to  
 5 identify the medications that were found in the purse.  
 6 Q You mean, you recall trying to identify the  
 7 medications, but you don't recall what you did with the  
 8 medication verification form; is that correct?  
 9 A Correct. I would -- I'm assuming that the  
 10 medication verification form was along with the pills  
 11 that were found.  
 12 Q I'm not quite understanding that answer. So  
 13 what -- what do you mean by it, "Was along with the  
 14 pills that were found"?  
 15 A So the medication that was found would have  
 16 went to medical, along with that form.  
 17 Q All right. So if I understand correctly, you  
 18 under -- you do recall trying to identify the pills that  
 19 were found in Ms. Boyer's purse; is that right?  
 20 A I don't believe I personally was trying to do  
 21 it, but I remember informing Amber that there was loose  
 22 medications in there.  
 23 Q Okay. Do you remember when you informed Amber  
 24 there was loose medications in there?  
 25 A When she was in booking, talking to Christine.

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1 Q Okay. And so as part of the booking process,  
2 you examined Ms. Boyer's purse; is that right?

3 A Correct.

4 Q And you were cataloging the property that was  
5 in that purse, such as the knuckles you described and  
6 the cash?

7 MR. MCCAULEY: Object to form.

8 A Correct. I was going through her purse, and  
9 logging the property.

10 Q Okay. And that's when you discovered the  
11 prescription bottle and the additional pills?

12 A Correct.

13 Q All right. So turning again, to the  
14 medication verification form. I'm just trying to  
15 understand -- make sure I understand what happened with  
16 this form, to the best of your recollection. You recall  
17 identifying pills, as part of the booking process. And  
18 then you all recall filling this form out; is that  
19 correct?

20 A I recall filling out the portions that we  
21 spoke about. Yes.

22 Q Okay. And then, is it correct that you --  
23 some of these pills, when you filled them out, hadn't  
24 been identified yet?

25 A Correct.

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1 Q All right. And so did you leave these pills  
2 for later identification for -- for someone else to  
3 continue trying to identify them?

4 MR. KNOTT: Form.

5 A Correct.

6 Q And again, do you remember where you left the  
7 pills, to have the identification process continue  
8 later?

9 A I don't recall exactly. But I'm assuming that  
10 they were placed in medical.

11 Q Okay. And is that assumption based on the  
12 standard process for identifying medications, that you  
13 haven't been able to identify yet?

14 A Correct. We don't leave just loose pills  
15 laying out in booking.

16 Q All right. And so if I understand correctly,  
17 the -- as you recall it -- turning back to the three  
18 forms we've been talking about, the face sheet and the  
19 intake screening report would be left in booking, in  
20 that wire basket. And this medication verification form  
21 would go back to medical; is that right?

22 MR. KNOTT: Form.

23 MR. MCCAULEY: Object to form.

24 A Correct.

25 Q I want to show you again, this is the

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1 observation log, Exhibit 8 that we've been discussing.

2 You -- your -- the night shift is 6:00 to 6:00; is that  
3 right?

4 A Correct.

5 Q All right. I see your last entry here is,  
6 "6:29 a.m.," do you see that?

7 A Yes.

8 Q Do you recall staying past your shift on  
9 December 22nd? -- in the morning of December 22nd.

10 A Yes.

11 Q I'm sorry.

12 A Yes.

13 Q I broke the rule. Let me -- let me get that  
14 out, so we're -- we're -- the court reporter doesn't  
15 have a headache. On the morning of December 22nd, this  
16 indicates that you stayed at least until, "6:29 a.m.,"  
17 do you see that?

18 A Yes.

19 Q And do you recall staying -- that was past  
20 your shift, correct?

21 A Correct.

22 Q Do you recall staying past your shift on the  
23 morning of December 22nd?

24 A Yes.

25 Q Do you recall why you stayed past your shift

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1 on the morning of December 22nd?

2 A Yes.

3 Q And why was that?

4 A We had a large amount of inmates being brought  
5 in to the jail at one time.

6 Q Okay. And why did that cause you to stay past  
7 your normal shift hour?

8 A I was helping trying to book people into the  
9 jail.

10 Q Do you recall how late you stayed on the  
11 morning of December 22nd?

12 A I don't recall.

13 Q My understanding from deposing -- we deposed  
14 Ms. Parker and Danielle Warren in this case, and my  
15 understanding of -- from deposing them, is that there is  
16 -- as shifts change over, that there is some interaction  
17 between the officers discussing the people who may be in  
18 booking. Is that consistent with your recollection?

19 A Yes.

20 Q Okay. Would you -- would it be the process  
21 that you typically discuss with the incoming shift, any  
22 special issues involving detainees who were -- had been  
23 booked into booking?

24 A Yes.

25 Q And would that include medical issues?

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1 A Yes.

2 Q Would it involve issues such as, any  
3 prescriptions they were on or prescriptions that they  
4 might need?

5 A Yes.

6 Q Do you recall speaking with anybody on that  
7 shift change about Ms. Boyer?

8 A I don't recall personally doing it, but I know  
9 that they were informed that she was up there on a  
10 medical watch.

11 Q How do you know that?

12 A Because they were completing the medical watch  
13 and filling out the form, so they were informed of it.

14 Q When you say, "Completing the medical watch  
15 and filling out the form," what are you referring to?

16 A Filling out the observation.

17 Q Okay. And that's the Exhibit 8, that we're  
18 looking at on the screen here?

19 A Correct.

20 Q And so what this form would have, is just the  
21 fact that someone's on medical watch, right?

22 A Correct.

23 Q Okay. Would any additional information be  
24 transferred over, besides just the simple fact that this  
25 person was on medical watch?

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1 MR. MCCAULEY: Object to form.

2 A There typically is, but I don't recall being  
3 the one doing it.

4 Q Do you not recall one way or the other you may  
5 have, or you may not have, or...?

6 A I would've assumed that I would've informed  
7 them of a medical watch.

8 Q Okay. And you would've informed them of the  
9 reason the person was on medical watch?

10 MR. MCCAULEY: Object to form.

11 A Correct.

12 Q Okay. Do you recall informing anybody that  
13 Ms. Pisney should be called about Ms. Boyer?

14 A I don't recall that.

15 Q Okay. Do you recall informing anybody that  
16 there was a medication verification form in the medical  
17 unit for Ms. Boyer?

18 A I don't recall that.

19 Q Was there any rule about what information you  
20 had to pass on about a detainee's medical condition,  
21 from one shift to the other?

22 MR. MCCAULEY: Object to form.

23 A Not that I'm aware of.

24 Q Was there any expectation about -- or a  
25 process about what information was typically passed on,

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1 about an inmate's medical condition, from one shift to  
2 the other?

3 MR. MCCAULEY: Object to form.

4 A Not that I'm aware of.

5 Q Okay. When you begin a shift, do you ever  
6 learn about -- beyond the fact that someone may be on a  
7 medical watch, do you ever learn any information about  
8 why they're on a medical watch?

9 MR. MCCAULEY: Object to form.

10 MR. KNOTT: Join.

11 A Yes.

12 Q Okay. And how do you learn that information?

13 MR. MCCAULEY: Same objection.

14 A Whether it's verbal pass on or in an e-mail.

15 Q Okay. So can you describe what, "Verbal pass  
16 on," is?

17 A Verbal would be one -- who's ever working in  
18 one area, telling the oncoming shift what's going on.

19 Q Were there any expectations that verbal pass  
20 on, would relay important medical information about a  
21 detainee --

22 MR. MCCAULEY: Object to form.

23 Q -- from one shift to the next?

24 MR. MCCAULEY: Object to form.

25 A Sorry. Can you repeat that again?

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1 Q Were you ever instructed about how to perform  
2 a verbal pass on from one shift to the next, about  
3 medical issues involving the detainee?

4 A Not that I can recall.

5 Q Were there any rules about what information  
6 would be contained in a verbal pass on from one shift to  
7 another, about medical issues concerning the detainee?

8 MR. MCCAULEY: Object to form.

9 A Not that I know of.

10 Q Okay. When you began a shift, how would you  
11 be assured that you had the relevant information about  
12 the detainees medical issues, who you were overseeing  
13 that shift. From a verbal pass on or some other way?

14 MR. MCCAULEY: Object to form.

15 A Typically, you just try to give them the most  
16 info that you can about the -- whatever sort of  
17 situation's going on.

18 Q Is that what you try to do in verbal pass on?

19 A Correct.

20 Q Okay. And so, returning to Ms. Boyer, do you  
21 remember whether or not you performed a verbal pass on  
22 to whomever was coming in?

23 MR. MCCAULEY: Object to form. Asked and  
24 answered.

25 A I don't recall.

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1 Q Okay. If you had performed a verbal pass on,  
2 would you have made an effort to describe all the  
3 important medical information about Ms. Boyer that you  
4 were aware of?

5 MR. MCCAULEY: Object to form.

6 A Yes.

7 Q Do you recall performing a verbal pass on with  
8 anybody, on the morning of December 22nd?

9 A I don't recall a specific one. But I just  
10 know that we had a large amount of inmates in, so there  
11 was a lot of information being passed around.

12 Q Okay. I want to turn you now to the -- well,  
13 let me ask real quick, and I think these questions will  
14 be fairly simple. After you ended your shift, what do  
15 you do?

16 MR. MCCAULEY: Object to form.

17 Q I'm assuming you go home and sleep; is that  
18 right?

19 A Correct. Or I go to the gym.

20 Q Okay. And then you had another shift  
21 beginning at 6:00 p.m. on the evening of the 22nd; is  
22 that right?

23 A Correct.

24 Q Okay. Do you remember when that shift began?

25 A I would assume 6:00 -- sorry, 6:00 p.m.

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1 Q And do you remember being assigned to any  
2 particular part of the jail on that shift, on the  
3 evening of the 22nd?

4 A I believe, I was in housing.

5 Q Okay. Were you in master control at any  
6 point, on the night shift of December 22nd to the 23rd?

7 MR. MCCAULEY: Object to form. Asked and  
8 answered.

9 A I believe, I was in there around 11:00,  
10 possibly a little bit after that.

11 Q So from 6:00 to 11:00, or thereabouts, you  
12 were assigned to housing, on the evening of the 22nd?

13 A Correct.

14 Q Okay. And then you transferred into master  
15 control; is that right?

16 A Correct.

17 Q When you're assigned to housing, and you begin  
18 a shift, is there any pass on for people who are in  
19 booking?

20 MR. MCCAULEY: Object to form.

21 A No.

22 Q Okay. How do you learn about any medical  
23 issues of people who were in booking, if you begin your  
24 shift in housing?

25 A I would not have.

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1 Q Okay. Do you recall -- there was a medical  
2 incident involving Ms. Boyer, which we'll talk about,  
3 but before that medical incident, do you recall having  
4 any information from anybody, about any medical issues  
5 Ms. Boyer experienced during the day shift on December  
6 22nd?

7 A No.

8 Q Okay. We've seen a few e-mails with your name  
9 on them, as a recipient. Do you -- when you begin a  
10 shift, is part of the practice to check e-mail, when you  
11 come in to a shift?

12 A Correct.

13 Q Okay. And is that wherever you are, whether  
14 you're in housing, or booking, or main control, part of  
15 the process at the beginning of a shift is to check your  
16 e-mail?

17 A Yes. At some point in your shift.

18 Q At some point on your shift?

19 A Correct. Whenever you're available to look at  
20 it.

21 Q Okay. If you're in housing, do you have any  
22 access to e-mail, if you're just beginning your shift in  
23 housing?

24 A I mean, not until you log into a computer back  
25 there.

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1 Q Okay. So there would be computers where you  
2 could log on to check your e-mail, if you're assigned to  
3 housing?

4 A Correct.

5 Q But there's no sort of procedure, at the  
6 beginning of your shift, just to check in -- all e-mails  
7 that have come in, over the course of the previous  
8 shift?

9 MR. MCCAULEY: Object to form.

10 A I mean, it's not like I just sit down, and go  
11 right into my e-mails right away. There's typically  
12 other things going on or getting pass on about housing -  
13 - what's going on in housing. But at some point, yeah,  
14 you should log in, and check your e-mail.

15 Q When you're changing assignments within the  
16 jail, say, from housing to booking, or booking to  
17 housing, is there a pass-on process that occurs there?

18 A Correct.

19 Q Okay. And how does that work?

20 A It's typically verbal.

21 Q Okay. Do you remember why your shift --  
22 during that shift, your assignment changed from housing  
23 to booking, on the night of December 22nd?

24 MR. MCCAULEY: Object to form.

25 Mischaracterizes.

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1 A Can you repeat that?  
 2 Q Sure. I believe you testified earlier, that  
 3 you began -- on the night of the night shift of December  
 4 22nd, you began the shift in housing, but somewhere  
 5 around 11:00 p.m., you transferred over to booking; is  
 6 that right?

7 MR. MCCAULEY: Same objection.

8 A I believe, I went into master control.

9 Q Okay. That's -- is that part of booking?

10 A It's in booking. Correct. But --

11 Q Fair enough. Do you remember why you  
 12 transferred that evening from housing to master control?

13 A I believe, we had a part-timer in there, and  
 14 they were going to be going home at 11:00 -- around  
 15 11:00.

16 Q Do you receive any pass off, when you go from  
 17 a place like housing to master control?

18 A If there's anything to pass on, they should  
 19 pass it on.

20 Q Okay. And what sort of things should you pass  
 21 on to someone in master control?

22 A A lot of the times, we'll get -- they're  
 23 called teletypes from other counties, asking about  
 24 inmates, or transfers, or things like that. That's  
 25 typically what your pass on is in master control.

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1 Q When you're going into master control, do you  
 2 typically get pass on about the medical issues that  
 3 detainees might be having in booking?

4 A No.

5 Q At the beginning of your shift -- I believe  
 6 you said, you don't recall talking with anybody about  
 7 Ms. Boyer at the beginning of your shift on December  
 8 22nd; is that right?

9 A Correct.

10 Q Okay. Up to the medical incident that  
 11 involved Ms. Boyer around 1:00 a.m., do you recall  
 12 having a conversation with anybody about Ms. Boyer's  
 13 medical condition?

14 A No.

15 Q Do you recall interacting with Shasta Parker  
 16 at all, on the evening of December 22nd?

17 A She called the jail.

18 Q In master control, you -- you look out onto  
 19 the booking area through a glass window; is that right?

20 A Correct.

21 Q Do you recall before Ms. Parker -- Shasta  
 22 Parker called the jail, do you recall having any  
 23 conversations with her or anybody else about Ms. Boyer,  
 24 over the course of the evening of December 22nd?

25 A No.

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1 Q Okay. Mr. Runice, I'm going to introduce an  
 2 exhibit -- and I believe we're at Exhibit 40 now. And  
 3 this is a document beginning on Bates Monroe County  
 4 000082 and going to 87. I'm going to scroll through  
 5 this document real quickly, Mr. Runice, and just ask --  
 6 if you recognize it?

7 (EXHIBIT 40 MARKED FOR IDENTIFICATION)

8 A I recognize it.

9 Q Okay. Was this one of the documents -- well,  
 10 let me get to the bottom here. Was this one of the  
 11 documents you reviewed in preparation for your  
 12 deposition today?

13 A Correct.

14 Q Okay. And the entry at 12-23-19 at 5:49 a.m.,  
 15 it says, "Runice, Lucas, late entry." Do you see that?

16 A Yes.

17 Q And then, I'll just start reading the event,  
 18 "At approximately 00:57, inmate Christine Boyer was  
 19 seen," and then it goes on. Is this -- did you prepare  
 20 this paragraph entry?

21 A Yes.

22 Q It's noted as a late entry. Why was it this -  
 23 - why was it late?

24 A I had several other things going on, trying to  
 25 contact people. And I was the only one that was able to

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1 open any of the doors to the jail.

2 Q So you were kind of dealing with the aftermath  
 3 of this incident for a while, and that's the reason the  
 4 entry was made later; is that right?

5 A Correct.

6 Q Okay. Does this document -- having reviewed  
 7 it, does it refresh your recollection at all about the  
 8 events involving Ms. Boyer's medical emergency?

9 A Yes.

10 Q Okay. When you say, "At approximately 00:57,  
 11 Christine Boyer was seen on camera laying on the floor  
 12 in booking cell 4," do you see that?

13 A Yes.

14 Q That would've been you who saw her?

15 A Correct.

16 Q So I'm assuming main control has a lot of  
 17 cameras looking at a bunch of different parts of the  
 18 jail; is that right?

19 A Correct.

20 Q And part of the job of main control -- the  
 21 person in there is to be monitoring those various  
 22 cameras; is that right?

23 A Correct.

24 Q And so, at some point, when your eyes reached  
 25 the camera that was on Ms. Boyer's cell, you noticed



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1 that she was lying on the floor; is that right?

2 A Correct.

3 Q Okay. It says, "Christine is on a medical  
4 watch due to her health issues," do you see that?

5 A Correct.

6 Q When you saw her lying on the floor, did you  
7 understand what health issues she was on medical watch  
8 for?

9 MR. MCCAULEY: Object to form.

10 A I don't believe so. No.

11 Q Okay. The next line says, "Sergeant Danielle  
12 Warren was informed of the situation and immediately  
13 reported to her cell," do you see that?

14 A Yes.

15 Q Okay. And was that you who informed  
16 Ms. Warren of the situation?

17 A Yes.

18 Q Okay. How did you do that; if you recall?

19 A I believe, the telephone.

20 Q Okay. And do you remember where Ms. Warren  
21 was when you informed her?

22 A I could not see her in the booking area.  
23 That's why I used the phone.

24 Q Okay. So she -- you couldn't see her in the  
25 booking area, you said?

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1 A Correct. I didn't see her sitting at one of  
2 the stations. So I called -- I knew she was in booking,  
3 but I couldn't see her at the counter, but I called the  
4 phone, so that she would come out to that area to answer  
5 the phone.

6 Q Okay. So at that point, Ms. Boyer -- I mean --  
7 - I'm sorry, Ms. Warren was stationed at booking and --  
8 but you just -- you didn't have a line of sight to her;  
9 is that right?

10 A Correct.

11 Q Did she pick up the phone, within a few  
12 seconds of you calling?

13 A Yes.

14 Q Okay. And what did she do, after she picked  
15 up the phone?

16 A I informed her what was going on and she said,  
17 okay, I'm going to go check on her. And she went over  
18 there immediately.

19 Q Okay. Meaning, she hung up the phone and  
20 walked right over to the cell?

21 A Correct.

22 Q Okay. And did you open it for her in master  
23 control?

24 A Correct.

25 Q Okay. The -- the next line is, "Christine

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1 was," lying, "On the floor, motionless, and gasping for  
2 air," do you see that?

3 A Correct.

4 Q Are you reporting what you're seeing on the  
5 video screen?

6 A And I had the intercom in the cell on.

7 Q Okay. So there's an audio feed from the cell  
8 as well?

9 A There's an emergency intercom that the inmates  
10 can push, if they're having a medical emergency. And  
11 I'm able to click on that intercom and listen.

12 Q Okay. And so what you're describing here is -  
13 - in this late entry, is what you're seeing on the  
14 video, and hearing through the intercom; is that right?

15 A Correct.

16 Q Okay. And so when you're saying, "Sergeant  
17 Warren attempted to get Christine's attention and for  
18 Christine to respond to her," that's something that  
19 you're seeing and hearing through the intercom and video  
20 feed, right?

21 A Correct.

22 Q Okay. "Christine did not respond to Sergeant  
23 Warren and continued gasping for air," do you see that?

24 A Correct.

25 Q Okay. That's again, something you're seeing

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1 and hearing, through the audio and video feeds from that  
2 cell, right?

3 A Correct.

4 Q The next line is, "Sergeant Warren radioed for  
5 jail staff to report to booking and call EMS"; you see  
6 that?

7 A Yes.

8 Q Okay. So that is an instruction. Did -- did  
9 -- does Ms. Warren have a handheld radio with her?

10 A Yes.

11 Q Okay. And that's how she performed that  
12 function?

13 A Correct.

14 Q Okay. And the, "Call EMS," was that an  
15 instruction that you understood to be directed to you?

16 A Yes.

17 Q Okay. And did you call EMS immediately?

18 A Yes.

19 Q Okay. It says, "Dispatch was contacted and  
20 informed the jail needed EMS for a non-responsive  
21 female, and that more officers would be needed." What  
22 does, "Dispatch," mean in this sentence?

23 A Dispatch is a department in the jail -- or  
24 sorry, a department in the sheriff's office.

25 Q Okay. So there -- the sheriff's office isn't



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1 just the jail? So when you're -- when you contact EMS,  
 2 what you're doing is contacting dispatch -- the dispatch  
 3 function at the sheriff's office, to let them know that  
 4 EMS needs to be contacted?  
 5 A Correct.  
 6 Q Okay. Let's see. And then, the next sentence  
 7 begins, "Officer Kyle Moga performed at sternum rub on  
 8 Christine's chest, which appeared to have no effect," do  
 9 you see that?  
 10 A Yes.  
 11 Q Okay. And Mr. Moga was elsewhere in the jail  
 12 when this emergency started; is that right?  
 13 A Correct.  
 14 Q Okay. So the next line is, "Approximately,  
 15 01:02, Officer Kyle Moga began giving Christine chest  
 16 compressions, while Sergeant Warren reported to master  
 17 control to retrieve the AED," do you see that?  
 18 A Yes.  
 19 Q And that's -- this sentence is you seeing what  
 20 you're seeing on the camera, and then, obviously,  
 21 Ms. Warren comes into your office for the AED; is that  
 22 right?  
 23 A That's correct.  
 24 Q Okay. All right. The next line is,  
 25 "Approximately, 01:05, the AED was placed on Christine

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1 and shock was delivered to her body." Again, that's  
 2 something you're seeing through the camera; is that  
 3 right?  
 4 A Correct.  
 5 Q Okay. The next line says, "Jail staff slid  
 6 Christine out of the cell and continued CPR on her,  
 7 outside the cell"; you see that?  
 8 A Yes.  
 9 Q Okay. And that's, again, something you're  
 10 watching on the camera?  
 11 A Correct.  
 12 Q Okay. The next line is, "Christine was given  
 13 a total of two shocks with the AED before EMS had  
 14 arrived," do you see that?  
 15 A Yes.  
 16 Q That's also something you're watching on the  
 17 camera?  
 18 A Correct.  
 19 Q Okay. The next line says, "Approximately,  
 20 01:07, EMS arrive and began CPR on Christine, outside of  
 21 the cell." That's again, something that you are  
 22 watching on the camera; is that right?  
 23 A Correct.  
 24 Q Okay. And then, "Christine was placed on a  
 25 gurney and placed in the ambulance, at approximately

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1 01:30," do you see that?  
 2 A Yes.  
 3 Q That would've been also something you watched  
 4 through the main control cameras?  
 5 A Correct.  
 6 Q Okay. The last line is, "Christine was  
 7 forwarded by med flight to," is that, "Gundersen  
 8 Lutheran La Crosse"?  
 9 A Correct.  
 10 Q "And is currently in the ICU," do you see  
 11 that?  
 12 A Yes.  
 13 Q So this last sentence, these are not things  
 14 that you would've seen, it's things that would've been  
 15 relayed to you; is that right?  
 16 A Correct.  
 17 Q Given that you're writing this at 5:49 a.m.,  
 18 and you're identifying these very precise times, are --  
 19 when you're preparing this summary, are you going back  
 20 over the video to provide an accurate summary of when  
 21 things happened?  
 22 A Correct. I used video to build some sort of  
 23 timeline of when everything happened.  
 24 Q Okay. So you're able to go back over video  
 25 that's already been taken, and go through it again to

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1 see exactly when things happened?  
 2 A Correct.  
 3 Q Did you ever leave the master control during  
 4 this emergency?  
 5 A Not that I recall.  
 6 Q Okay. Do you recall Shasta Parker calling in  
 7 at some point, in the evening -- or on the shift?  
 8 A Yes.  
 9 Q Do you recall when she called you -- or when  
 10 she called in? I'm sorry.  
 11 A I don't recall the exact time, but it was  
 12 during this incident.  
 13 Q During the emergency?  
 14 A Correct.  
 15 Q This is just a, kind of, a mechanical  
 16 question, how would she reach you in master control, if  
 17 she called in from outside of the jail?  
 18 A The master control center is basically -- if  
 19 you ever called the jail, there's a main phone and  
 20 master control answers that phone. So she must have  
 21 called from the outside in.  
 22 Q Okay. So she can call the jail number, and  
 23 because you're in master control, it's going to come to  
 24 you; is that right?  
 25 A Correct.

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1 Q Do you remember what Ms. Parker said when she  
2 called in?  
3 A I believe, she asked to speak to Kyle.  
4 Q Okay. And that's Kyle Moga?  
5 A Correct.  
6 Q Do you recall her saying anything else?  
7 A I don't remember the exact conversation of how  
8 it all went on.  
9 Q Do you recall her asking about Ms. Boyer at  
10 all?  
11 A I recall me telling her that we were in the  
12 middle of an incident with Ms. Boyer, and that Kyle was  
13 unavailable to talk at the moment.  
14 Q When you told her that, do you recall how  
15 Ms. Parker reacted?  
16 MR. MCCAULEY: Object to form.  
17 A I -- I don't recall exactly how. She -- she  
18 basically ended the conversation, and that was the end  
19 of it.  
20 Q You say you don't recall exactly, is there --  
21 is there anything you recall at all about that -- about  
22 how she reacted?  
23 MR. MCCAULEY: Same objection.  
24 A I mean, she sounded, I guess, excited in a --  
25 in a sense, but I'm -- I'm assuming that I kind of

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1 sounded excited, and that's why -- maybe that's what  
2 excited her is because we had a medical emergency going  
3 on, and I wasn't able to talk on the phone.  
4 Q Now, when you say, she was, "Excited," what do  
5 you -- what do you mean?  
6 A As in, in a hurry. We like -- we ended the  
7 phone call quickly.  
8 Q Okay. Obviously, you don't mean that she was  
9 excited, in the sense that she was happy?  
10 A No. Just -- she started speaking a lot  
11 faster.  
12 Q Okay. What did she say, when she started  
13 speaking quickly?  
14 A She said, okay, I'll let you go. Or something  
15 along those lines, of -- we ended the call.  
16 MR. WEIL: Okay. All right. Mr. Runice, if  
17 you give me a minute, I may have nothing more.  
18 Let's just go off the record for -- for five  
19 minutes, and then that may be it.  
20 COURT REPORTER: We are off the record. The  
21 time is 11:17 a.m.  
22 (OFF THE RECORD)  
23 COURT REPORTER: We are back on the record. The  
24 time is 11:22 a.m.  
25 BY MR. WEIL:

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1 Q All right. Mr. Runice, I just have a few more  
2 questions for you. The first thing I'm going to do is  
3 introduce another exhibit, it's Exhibit 41. It is Bates  
4 number Monroe County 5264 through 5271. And I'm going  
5 to scroll through real quickly, Mr. Runice, and just ask  
6 whether you've seen this before? Have you -- were you  
7 able to --  
8 (EXHIBIT 41 MARKED FOR IDENTIFICATION)  
9 A Yes.  
10 Q Okay. When you say, "Yes," have you seen this  
11 document before?  
12 A Correct.  
13 Q Is this a document you reviewed, in  
14 preparation for your deposition today?  
15 A No.  
16 Q Okay. Do you recognize this document?  
17 A Not -- not that one. My -- my own, I would  
18 recognize.  
19 Q Okay. So, we're on page 5266. And it's the -  
20 - up at the top, it says, "Supplemental Report By Lucas  
21 Runice," do you see that?  
22 A Yes.  
23 Q Do you -- so you do recognize this document?  
24 A Correct.  
25 Q It says, "Typed by Lucas Runice," do you see

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1 that?  
2 A Yes.  
3 Q Is this a document you typed?  
4 A Yes.  
5 Q It says, "Supplemental Report By Lucas  
6 Runice." Do you understand what, "Supplemental," means?  
7 A Yes.  
8 Q What does it mean?  
9 A It means that it is just another -- basically,  
10 it's -- it was a person that was involved in the  
11 situation, but not the main person involved in it. It  
12 accompanies another report.  
13 Q At the top do you see, "Primary Report By  
14 Danielle Warren"?  
15 A Correct.  
16 Q I'm trying to understand the process for  
17 creating these reports. It -- is the primary report  
18 written, and the supplemental reports are designed to  
19 supplement what's in the primary report?  
20 A Correct.  
21 Q Do the persons who are creating supplemental  
22 reports, do they read the primary report before entering  
23 the supplemental reports?  
24 A No.  
25 Q So would you have read this report by

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1 Ms. Warren, before creating your supplemental report?  
 2 A No.  
 3 Q I may have asked my next question, but I just  
 4 want to make sure. The -- so we're looking at Exhibit  
 5 3, the intake medical screen report. Do you see that in  
 6 front of you, Mr. Runice?  
 7 A Yes.  
 8 Q We've talked about this document some. And  
 9 you testified that this would be something that you  
 10 would append to the face sheet, and then place in the  
 11 box, in the wire basket in booking, right  
 12 A Correct.  
 13 Q Okay. Would you read the intake medical  
 14 screening report as it was being attached -- as you  
 15 attached it to the face sheet, before putting in the  
 16 wire box?  
 17 MR. MCCAULEY: Object to form.  
 18 A Not if I was the one who -- no. No.  
 19 Q When you were saying, "If," what did you --  
 20 what was the condition that you were thinking of?  
 21 A If I -- if it was sitting out, as in, it  
 22 wasn't put together into a packet, I would scan over it.  
 23 Q Okay. And if you're the person in booking,  
 24 would you be the person who would be putting it together  
 25 into a packet?

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1 A No. Not necessarily.  
 2 Q Who else would do that?  
 3 A The person who did the medical screening  
 4 report.  
 5 Q In the pass on between the p.m. shift -- on  
 6 the night shift on December 21st to 22nd, passing on to  
 7 the day shift on December 22nd, do you recall anybody  
 8 doing pass on from the night shift to the day shift,  
 9 about Ms. Boyer?  
 10 A I don't remember.  
 11 Q Okay. All right. I'm showing you what's been  
 12 marked as Exhibit 8, Mr. Runice, and we've gone over  
 13 this. This is the observation log for Ms. Boyer. Do  
 14 you see your entry at, "5:15 a.m.," for -- the code is,  
 15 "10"?  
 16 A Yes.  
 17 Q Okay. And that's a meal code; is that right?  
 18 A I believe, it's meal accepted.  
 19 Q Okay. You -- that's down here at the bottom,  
 20 "Meal Offered (Accepted)"; is that right?  
 21 A Correct.  
 22 Q Okay. Is it your practice to record if  
 23 somebody doesn't eat their meal?  
 24 A Correct.  
 25 Q Okay. And so -- is -- do you see any record

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1 here of Ms. Boyer not eating her meal?  
 2 A No.  
 3 Q Okay. Does that indicate to you that  
 4 Ms. Boyer ate her meal that you offered to her at 5:15  
 5 a.m.?  
 6 A Correct.  
 7 MR. WEIL: Okay. Thank you, Mr. Runice. I  
 8 appreciate your time today. That -- those are all  
 9 the questions I have.  
 10 MR. MCCAULEY: Thank you.  
 11 MR. KNOTT: I have some quick follow-ups if I  
 12 could.  
 13 CROSS EXAMINATION  
 14 BY MR. KNOTT:  
 15 Q Mr. Runice, do you understand I represent  
 16 Amber Fennigkoh, Lisa Pisney, and the Advanced  
 17 Correctional Defendants.  
 18 MR. MCCAULEY: Go ahead.  
 19 A Yeah.  
 20 Q And you can hear me?  
 21 A Yep.  
 22 Q Okay. I wanted to ask you about that -- at  
 23 the time of intake you said, did you say, she had  
 24 several sets of brass knuckles with her?  
 25 A That's correct.

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1 Q How many; if you remember?  
 2 A I don't remember an exact number off hand.  
 3 Q Are the contents of the purse inventoried?  
 4 A Sorry. Can you repeat that?  
 5 Q Are the contents of the purse inventoried --  
 6 is that, as a routine practice, is that usually  
 7 inventoried?  
 8 A Yes.  
 9 Q And do you know, if you did that in this case?  
 10 A The brass? Yes.  
 11 Q Okay.  
 12 A Yep.  
 13 Q And you said -- well, first of all, did you  
 14 ask her why she had brass knuckles; do you remember?  
 15 A I don't recall asking her about them.  
 16 Q Okay. And she had, you said a lot of cash. Do  
 17 you know how much cash she had?  
 18 A I don't remember the exact number, but it was  
 19 in the thousands.  
 20 Q Okay. Did you ask her, if you recall, why she  
 21 had so much cash?  
 22 A I don't recall asking about the cash.  
 23 Q You said, that Amber Fennigkoh was present  
 24 during that intake process. That's not a normal  
 25 process, is it? Where -- to have the nurse involved in

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1 the intake medical screening?  
 2 A No.  
 3 Q So that was an unusual thing that happened on  
 4 this day that Amber happened to be there, right?  
 5 MR. WEIL: Object to form.  
 6 A Correct.  
 7 Q And my understanding is that you didn't do any  
 8 documentation on the intake medical screening, right?  
 9 MR. WEIL: Object to form.  
 10 A Correct.  
 11 Q So would you be in a position to know whether  
 12 the intake medical screening was completed before or  
 13 after Amber's interview with Ms. Boyer?  
 14 A I'm sorry. Can you repeat the question again?  
 15 Q Would you be in a position to know today -- to  
 16 have a recollection of whether the intake medical  
 17 screening form was completed before or after Amber did  
 18 her interview with Ms. Boyer?  
 19 A I don't know.  
 20 Q Okay. I wanted to ask you quickly about  
 21 Amber's note. If I share that screen, can you read it?  
 22 A Yes.  
 23 Q Okay. This is Exhibit 6. My question, sir,  
 24 is Amber wrote, "RN instructed jail staff to alert NP of  
 25 situation when able," and you said you don't recall

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1 that, is that an accurate reciting of your testimony?  
 2 A Correct.  
 3 Q And is it fair to say, that it may have  
 4 happened that Amber instructed the jail staff to alert  
 5 the nurse practitioner of the situation, you just don't  
 6 have a recollection of it today?  
 7 MR. WEIL: Object to form.  
 8 COURT REPORTER: I'm sorry. Who just said,  
 9 "Object to form?"  
 10 MR. WEIL: Plaintiff.  
 11 COURT REPORTER: Okay.  
 12 BY MR. KNOTT:  
 13 A She may have said it, but it wasn't -- I don't  
 14 believe it was to me.  
 15 Q Okay. You believe it was to Parker -- I'm --  
 16 I'm not -- I mean Warren?  
 17 A I -- I don't know if she did or not. I don't  
 18 know.  
 19 Q Okay. All right. Is it your habit, and  
 20 custom, and routine to notify the nurse practitioner, if  
 21 there are any meds to verify?  
 22 MR. WEIL: Object to form.  
 23 A Correct. If -- if medical is not on, and they  
 24 need medications, we call them in.  
 25 Q So I just want to make sure I understand that.

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1 So if you're working with an inmate at intake, and you  
 2 complete a medication verification form, it's the normal  
 3 practice that you would contact the provider to talk  
 4 about those medications, isn't it?  
 5 MR. WEIL: Object to form.  
 6 A If -- if they needed the medications  
 7 immediately. If -- if -- if it was in the middle of the  
 8 night, and they needed them immediately? Then, yes, you  
 9 would call, and make sure that they can have that  
 10 medication.  
 11 Q Okay. It may be sooner, or it may be later,  
 12 depending on what the need is, but the normal routine is  
 13 that one of the COs would contact the provider, true?  
 14 MR. WEIL: Object to form.  
 15 A Correct.  
 16 Q And I'm -- I just wanted to ask you a few  
 17 things about this medication verification form. Can you  
 18 read that on your screen?  
 19 A Yes.  
 20 Q It's Exhibit 18. And this time, 00:10, what  
 21 does that time signify?  
 22 MR. WEIL: Doug, I'm sorry. Where are you  
 23 looking? Where are you seeing 00:10?  
 24 MR. KNOTT: At the time at the top left.  
 25 MR. WEIL: Okay. Got it. Sorry. Apologies.

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1 Go ahead.  
 2 BY MR. KNOTT:  
 3 A I guess, I'm not sure.  
 4 Q Typically, when you would complete a  
 5 medication verification form, what time would you put in  
 6 there? I mean, you know what I'm getting at, but does  
 7 it mean you're starting the form then, does it mean that  
 8 you're making a call then, anything else?  
 9 A It -- it would mean the time that you're  
 10 starting the form.  
 11 Q Okay. And the oxycodone prescription, you  
 12 count the number of pills in the bottle, correct?  
 13 MR. WEIL: Object to form.  
 14 A Correct.  
 15 Q And do you perform a calculation on whether  
 16 it's the right amount of pills in the bottle for the  
 17 date of the prescription? Is that something you, as a  
 18 CO, do?  
 19 A No.  
 20 Q Okay. And I wasn't sure from the prior  
 21 testimony whether you have a recollection of actually  
 22 calling the provider about these medications, did you?  
 23 A I did not contact them.  
 24 Q Okay. So there's another officer's number  
 25 down here. Do you believe that it was that officer,

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1 that contacted the provider?

2 MR. WEIL: Object to form.

3 A I'm guessing so since I'm, I'm guessing so. I  
4 don't know for sure.

5 Q All right.

6 MR. WEIL: Doug, to be clear, when you're  
7 referring to provider, are you talking about  
8 Medicine Shoppe or something else?

9 MR. KNOTT: I was talking about Lisa Pisney,  
10 the nurse provider. Did you have that  
11 understanding? I'll move on.

12 BY MR. KNOTT:

13 Q Mr. Runice, what is, what did you write here?  
14 It says, "TW8," what does that signify?

15 A I'm not sure what the TW is, but the -- but  
16 the eight would be the number of pill -- or the number  
17 of -- of the -- whatever sort of pill it is.

18 Q Okay. And does that say, "Disintegrating"?

19 A I believe so.

20 Q Do you know what that meant?

21 A I don't.

22 Q Yeah. It's fair. It's been a long time. If  
23 it had a pharmacy name and phone number on the bottle,  
24 would you have put that on the medication verification  
25 form?

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1 A Yes.

2 MR. WEIL: Object to form.

3 Q And then this next medication is, "Aspirin,"  
4 and under the number of pills in the bottle, can you  
5 tell me what that says?

6 A It looks -- I just see a three and a two.  
7 Looks like three -- it looks like three and I don't  
8 know. I guess, I can't. I -- I don't know.

9 Q Okay. And do you know what this symbol here?  
10 It looks like an, "L," next to aspirin?

11 A Correct.

12 Q Did you write that?

13 A No.

14 Q Okay. Do you know what it is?

15 A No.

16 Q And this handwriting for aspirin looks, like,  
17 a little bit on the lighter side, which, when you were  
18 asked before, I think with respect to this language up  
19 here near the ondansetron, I think you said was not your  
20 writing. Let me ask you first, am I correct that the  
21 writing that I'm pointing to now next to a ondansetron  
22 that says, "As needed for nausea for chemo/radiation,"  
23 did you write that?

24 A No.

25 Q Okay. And do you believe that you wrote,

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1 "Aspirin"?

2 A No.

3 Q And the same with respect to, "Unknown," is  
4 that your handwriting?

5 A No.

6 Q And this language about the albuterol inhaler,  
7 did you write that language?

8 A I don't believe so.

9 Q Okay. Why do you think that's not yours, just  
10 the handwriting or for some other reason?

11 A The handwriting. I guess, I think it looks  
12 different.

13 Q So you said that you put the medication  
14 verification form together with the medications in a  
15 baggie, and you put that in medical. Is that  
16 retrievable by the correctional staff, after you put it  
17 in medical?

18 MR. MCCAULEY: Object to form.

19 A If I -- if I do that -- yeah. I -- I  
20 typically set it in the nurse's office, which is  
21 available to other staff.

22 Q Okay. So it doesn't go on a slot or  
23 something, where you can't retrieve it, right?

24 A Correct.

25 Q And just one more. Bear with me, sir. Sir,

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1 I'm showing you an e-mail that Amber Fennigkoh has sent  
2 on Sunday -- says that Amber sent it on Sunday, December  
3 22, at 6:02 p.m. And it's addressed to Warren, Runice,  
4 Parker, and Moga. Do you have a recollection of getting  
5 this e-mail?

6 A Yes.

7 Q What do you remember about that?

8 A That I got the e-mail, and that he was  
9 supposed to be dropping off the meds that night.

10 Q If -- do you have a recollection of Greg Boyer  
11 arriving at the jail?

12 A Yes.

13 Q Do you recall when he arrived?

14 A It was during the medical emergency, when he  
15 showed up.

16 Q And did you have any discussions with  
17 Mr. Boyer that night?

18 A No. I did not. Other than he rang up on the  
19 public entrance intercom, and said that he was here to  
20 drop off meds. And I told him to please wait outside,  
21 because I was in the middle of the medical emergency.

22 Q Okay. Did -- so he stayed outside the  
23 building?

24 A I believe, he waited outside, or he may -- I  
25 may have opened the door to let him wait inside the



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1 lobby -- inside the public lobby.  
 2 Q Did you ever indicate to him, that the medical  
 3 emergency had to do with his wife?  
 4 A No.  
 5 Q And do you know, was he eventually admitted to  
 6 the jail?  
 7 A Sorry, can you repeat that question?  
 8 Q Was he eventually admitted into the -- some  
 9 part of the jail?  
 10 A I know -- yeah. He was in the public lobby.  
 11 Q And do you know, if anybody went to talk to  
 12 him there?  
 13 A I believe, Officer Schwanz did -- Jeff  
 14 Schwanz.  
 15 Q Okay. Did Schwanz tell you what Mr. Boyer had  
 16 said to him?  
 17 A No.  
 18 Q Do you have any other basis for knowing what  
 19 Mr. Boyer told anybody that night?  
 20 A No.  
 21 MR. KNOTT: Okay. Those are the questions I  
 22 have. So, thank you, sir.  
 23 MR. MCCAULEY: Doug -- Hey, Doug, is this, is  
 24 this e-mail an exhibit?  
 25 MR. KNOTT: Yeah. It's -- I have it as Exhibit

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1 9.  
 2 (EXHIBIT 9 MARKED FOR IDENTIFICATION)  
 3 MR. WEIL: Yeah.  
 4 MR. MCCAULEY: Okay.  
 5 MR. WEIL: It's Exhibit 9.  
 6 MR. MCCAULEY: Okay. Great.  
 7 MR. WEIL: John, do you have any questions?  
 8 MR. MCCAULEY: I have no questions.  
 9 MR. WEIL: Okay. I just a couple, based on Mr.  
 10 Knott's questions. Let me --  
 11 MR. MCCAULEY: Sure.  
 12 REDIRECT EXAMINATION  
 13 BY MR. WEIL:  
 14 Q Mr. Runice, I'm showing you Exhibit 6, which  
 15 Mr. Knott just reviewed to you -- with you, and I want  
 16 to direct you to the bottom of Ms. Fennigkoh's entry. It  
 17 talks about, "RN further explained the difficulty as our  
 18 pharmacy's not open on Sunday, so jail's unable to call  
 19 to get a med list"; you see that?  
 20 A Yes.  
 21 Q Do you recall hearing Ms. Fennigkoh say that  
 22 to Ms. Boyer?  
 23 A No.  
 24 Q Okay. It says a little lower at, "PT," which  
 25 I believe, stands for patient, "Patient said that there


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1 should be some loose pills in my purse. Will that  
 2 help?"; you see that?  
 3 A Yes.  
 4 Q Do you recall Ms. Boyer making that statement?  
 5 A No.  
 6 Q Do you recall someone informing you that  
 7 Ms. Boyer had said that there might be some loose pills  
 8 in her purse?  
 9 A No.  
 10 Q Okay. Do you recall someone saying, that  
 11 there might be some loose pills in Ms. Boyer's purse?  
 12 A No.  
 13 Q The next line says, "RN assisted CO with  
 14 identifying loose pills," do you see that?  
 15 A Yes.  
 16 Q Do you recall working with Ms. Fennigkoh to  
 17 identify the loose pills that you found?  
 18 A No.  
 19 Q Do you recall working with anybody, to try to  
 20 identify the loose pills?  
 21 A I don't recall. No.  
 22 Q Do you recall trying to identify the loose  
 23 pills yourself?  
 24 A No.  
 25 Q Do you recall somebody else working with

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1 Ms. Fennigkoh to try to identify the loose pills?  
 2 A No. I don't know.  
 3 Q Was Ms. Warren around the booking area, around  
 4 the time that you identified the loose pills in  
 5 Ms. Boyer's purse?  
 6 A Yes. She was there when I found the pills.  
 7 Q Do you recall Ms. Warren trying to identify  
 8 the loose pills?  
 9 A I don't recall.  
 10 Q Okay. Do you recall her conferring at all  
 11 with Ms. Fennigkoh, maybe you don't know about what, but  
 12 conferring with her about, around this time?  
 13 A I -- I don't remember.  
 14 Q When you say you remember that Ms. Warren was  
 15 around, where, where was she during this time of when  
 16 you identified the loose pills?  
 17 A Sorry. Can you repeat that question?  
 18 Q Sure. You said a moment ago, that you  
 19 remember Ms. Warren being around the booking area,  
 20 around the time that you identified the loose pills. So  
 21 I'm just trying to place her about where she would've  
 22 been during that time. And so that's -- I'm just asking  
 23 your recollection about that.  
 24 A She was standing near the booking -- by the  
 25 booking counter, while I was going through the property,



<p style="text-align: right;">Page 98</p> <p>1 logging the property.</p> <p>2 Q Between the time that you identified the loose</p> <p>3 pills, placed them in the baggie, and placing them in</p> <p>4 the med office, did anybody -- do you remember anybody</p> <p>5 looking at those pills and trying to identify them?</p> <p>6 MR. WEIL: Object to form. Mischaracterizes.</p> <p>7 A I don't remember.</p> <p>8 MR. KNOTT: I'm sorry -- I'm sorry to</p> <p>9 interrupt. I join the objection. Sorry.</p> <p>10 Q You don't remember?</p> <p>11 A I don't -- I don't remember.</p> <p>12 Q Okay. Do you remember placing the pills in a</p> <p>13 baggie along with the medication verification form, and</p> <p>14 walking them to the medical office? Or is that just a</p> <p>15 procedure that you usually performed?</p> <p>16 MR. MCCAULEY: Object to form. Asked and</p> <p>17 answered.</p> <p>18 A That's just a -- that's just something that I</p> <p>19 do when -- that I personally do, when people come in</p> <p>20 with medications.</p> <p>21 Q Okay. Do you have a specific memory in</p> <p>22 Ms. Boyer's case of doing that?</p> <p>23 MR. MCCAULEY: Same objection.</p> <p>24 A I don't recall doing it.</p> <p>25 MR. WEIL: Okay. That's all I have. Thank</p>	<p style="text-align: right;">Page 100</p> <p style="text-align: center;">CERTIFICATE OF REPORTER</p> <p>1</p> <p>2</p> <p>3</p> <p>4 I do hereby certify that the witness in the foregoing</p> <p>5 transcript was taken on the date, and at the time and</p> <p>6 place set out on the Title page hereof, by me after</p> <p>7 first being duly sworn to testify the truth, the whole</p> <p>8 truth, and nothing but the truth; and that the said</p> <p>9 matter was recorded digitally by me and then reduced to</p> <p>10 typewritten form under my direction, and constitutes a</p> <p>11 true record of the transcript as taken, all to the best</p> <p>12 of my skill and ability. I certify that I am not a</p> <p>13 relative or employee of either counsel and that I am in</p> <p>14 no way interested financially, directly or indirectly,</p> <p>15 in this action.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20 </p> <p>21</p> <p>22 KRYSTAL BARNES,</p> <p>23 COURT REPORTER/NOTARY</p> <p>24 MY COMMISSION EXPIRES: 02/18/2026</p> <p>25 SUBMITTED ON: 04/28/2022</p>
<p style="text-align: right;">Page 99</p> <p>1 you, Mr. Runice.</p> <p>2 THE WITNESS: Thank you.</p> <p>3 MR. MCCAULEY: I have no more. Thank you, sir.</p> <p>4 MR. WEIL: Thank you very much, Mr. Runice.</p> <p>5 Appreciate your time.</p> <p>6 COURT REPORTER: Okay.</p> <p>7 MR. WEIL: Thank you, guys.</p> <p>8 COURT REPORTER: One second. Before you go, I</p> <p>9 will get us off of the record.</p> <p>10 (DEPOSITION CONCLUDED AT 11:54 A.M.)</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	

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